

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FILED JUL 9 2002

IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION (NO. VI)

This Document Relates To:

ROBERT RYAN and
CONNIE RYAN, h/w

Plaintiffs,

v.

PNEUMO ABEX CORPORATION, et al.,

Defendants.

CIVIL ACTION NO. MDL 875

(Transferor Docket No. 02-CV-3534 (E.D. Pa.))

SHORT FORM ANSWER

This Short Form Answer and Affirmative Defenses is filed pursuant to Paragraph 3(d) of the Order for Pleadings in Cases Which Contain Asbestos-Related Personal Injury Claims, as amended, and incorporates by reference as if fully set forth herein the Master Affirmative Defenses and the provisions of the Order whereby, inter alia, all allegations in the Master Long Form Complaint are deemed denied, and asserts, by way of further answer to plaintiffs' Short Form Complaint, the following defenses.

1. Defendant Lac d'Amiante du Quebec, Ltee ("LAQ") specifically denies that it has ever mined, milled, manufactured, produced, supplied, distributed and/or otherwise sold any asbestos-containing products.

2. Plaintiffs' complaint fails to state a claim and/or claims upon which relief could be granted.

3. Defendant LAQ made no warranties, either express or implied.

4. The asbestos fiber supplied by LAQ, if any, was being used in a manner other than that for which it was intended.

5. The asbestos fiber supplied by LAQ, if any, was altered by other persons before plaintiff's exposure thereto, if any.

6. The liability of LAQ, if any, is limited and otherwise subject to the terms and conditions of sale and delivery, as set forth in the applicable documents relevant to such sales and delivery, if any were made.

7. Plaintiffs' claims are barred by contributory negligence.

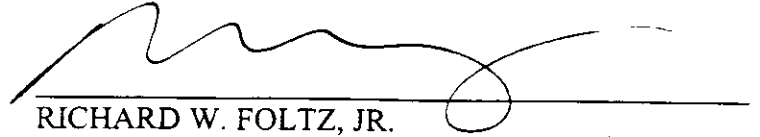
8. LAQ has not been properly served with process.

9. An award of punitive damages in this Action would be violative of defendant's rights under the Fifth, Eighth and Fourteenth Amendments to the United States Constitution.

10. An award of punitive damages in this Action would be violative of Article I, Sections 2, 10 and 13 of the Pennsylvania Constitution.

11. Plaintiffs' alleged injuries and/or losses were caused by the negligence of other parties, which cause superseded any negligence, none being admitted, on the part of LAQ.

12. Plaintiffs' claims are barred by the statute of limitations.

A handwritten signature in black ink, appearing to read 'Richard W. Foltz, Jr.', is written over a horizontal line.

RICHARD W. FOLTZ, JR.
Atty. I.D. No.: 33554
PEPPER HAMILTON LLP
3000 Two Logan Square
Eighteenth & Arch Streets
Philadelphia, PA 19103-2799
(215) 981-4000

Attorneys for Defendant,
LAC D'AMIANTE DU QUEBEC, LTEE
(formerly known as Lake Asbestos of Quebec, Ltd.)

Dated: July 9, 2002

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of defendant Lac d'Amiante du Quebec, Ltee's Entry of Appearance and Short Form Answer this 9th day of July 2002, by first-class mail, postage prepaid, to the counsel listed on the attached service list.

Cynthia L. Reynolds
CYNTHIA L. REYNOLDS
Senior Legal Assistant

Rev. 7/9/2002

RYAN COUNSEL LIST

Plaintiffs

Lawrence R. Cohan, Esq.
Anapol, Schwartz, Weiss,
Cohan, Feldman & Smalley, P.C.
1900 Delancey Place
Philadelphia, PA 19103

Combustion Engineering, Inc.

John J. Delany, III, Esq.
Delany & O'Brien
Constitution Place
325 Chestnut Street
Suite 1212
Philadelphia, PA 19106

**Corhart Refractories
Foster Wheeler Corporation**

William A. Fynes, Esq.
Kevin J. O'Brien, Esq.
Marks, O'Neill, O'Brien & Courtney, PC
1880 John F. Kennedy Boulevard
Suite 1200
Philadelphia, PA 19103

Crown Cork & Seal Company, Inc.

Michael J. Stack, Esq.
Stack & Stack, PC
1600 Locust Street
Philadelphia, PA 19103

Garlock, Inc.

Fredric L. Goldfein, Esq.
Goldfein & Hosmer
1600 Market Street
33rd Floor
Philadelphia, PA 19103-7288

IMO Industries, Inc.

(Address Unknown)

NORCA Corporation

S. David Fineman, Esq.
Fineman & Bach, P.C.
1608 Walnut Street
19th Floor
Philadelphia, PA 19103-5413

Pfizer, Inc.

C. James Zeszutek, Esq.
Thorp Reed & Armstrong, LLP
One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219-1425

Pneumo Abex Corporation

Edward J. Wilbraham, Esq.
Wilbraham, Lawler & Buba
1818 Market Street
Suite 3100
Philadelphia, PA 19103-3631

Pneumo Abex Corporation

Steven B. Kantrowitz, Esq.
Kantrowitz & Phillippi, LLC
Suite 4210
Centre Square West
1500 Market Street
Philadelphia, PA 19102

Magnetek, Inc. (as successor in
interest to Wagner Electric
Corporation)

Bruce H. Bikin, Esq.
Montgomery, McCracken, Walker
& Rhoads
Fidelity Building
123 S. Broad Street
Philadelphia, PA 19109-1029

Uniroyal, Inc.

Alan Klein, Esq.
Hangle, Aronchick, Segal
& Pudlin
One Logan Square
18th & Cherry Streets
12th Floor
Philadelphia, PA 19103-6933